

EXHIBIT M

Declaration of Omar Gonzalez-Pagan in support of
Motion to Exclude Expert Testimony of Dr. Paul W. Hruz
Kadel v. Folwell, No. 1:19-cv-00272-LCB-LPA (M.D.N.C.)

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

7 CIVIL ACTION NO.: 1:19-cv-272-LCB-LPA

9 MAXWELL KADEL, et al.

10 Plaintiffs

12 v.

14 DALE FOLWELL, et al.

15 Defendants

18 REMOTE VIDEOTAPED VIDEOCONFERENCE

19 DEPOSITION TESTIMONY OF:

20 PATRICK LAPPERT, M.D.

21 September 30, 2021

A P P E A R A N C E S

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16
17 ALSO PRESENT (via remote
18 videoconference):

19
20 Andrew Baker, Videographer

1 these meetings in more detail. So, how
2 many -- strike that.

3 You've been to two meetings
4 organized by ADF?

5 A. That's my recoll- -- yeah, two
6 meetings. I think that's right.

7 Q. All right. Let's start with the
8 first one. This was in 2017?

9 A. That sounds about right, yeah.

10 Q. What --

11 A. I think it was 2017, yeah.

12 Q. What month roughly?

13 A. I don't remember now.

14 Q. Do you know how they came to
15 invite you to that first meeting?

16 A. I do not.

17 Q. Before that meeting, you had not
18 published anything about gender
19 dysphoria, had you?

20 A. No.

21 Q. Before that meeting, you had not
22 published anything about the risks of use
23 of hormone blockers in minors; right?

1 A. No. I've given -- I gave some
2 -- some -- I think they may have heard of
3 me not through publications, but through
4 public speaking.

5 Q. How long have you been doing
6 public speaking on the issues related to
7 gender dysphoria?

8 A. Since 2014.

9 Q. Let's start with the first
10 meeting. So, Dr. Hruz was also present
11 at that meeting?

12 A. Yes.

13 Q. Was Dr. Levine present at that
14 meeting?

15 A. I don't think I've ever met Dr.
16 Levine, so I don't -- he couldn't have
17 been there because I would have
18 remembered meeting him, and I don't
19 remember ever having met him.

20 Q. How about Dr. McHugh?

21 A. No. I would have remembered
22 him. He's a very famous person.

23 Q. How many people were present at

1 heart of the presentation was what's the
2 state of the science and where is the
3 reliable science coming from and what is
4 it -- what is it showing us, so. But
5 they also -- the audience wanted to have
6 an understanding of what these plastic
7 surgery interventions were. So there was
8 an extensive discussion of the
9 particulars of the surgeries, the details
10 about the surgeries, the typical outcomes
11 of the surgeries, so.

12 Q. I want to -- strike that.

17 MR. KNEPPER: Objection, form,
18 scope.

19 A. I remember -- I remember a
20 fairly long discussion about the poverty
21 of people who are willing to testify
22 because of the risk that they take in
23 testifying. That was a -- that was a

1 fairly long discussion. And the
2 difficulty that that -- that people have
3 in finding expert witnesses because of
4 the risks they place themselves in, in
5 testifying.

6 Q. And people at that meeting were
7 asked whether they would be willing to
8 participate as expert witnesses; right?

9 A. Yes.

10 Q. Before that meeting, you had
11 never testified as an expert witness?

12 A. Before this moment, I never
13 testified as an expert witness.

14 Q. Who made the introductory
15 remarks at the beginning of this meeting?

16 MR. KNEPPER: Objection, form,
17 scope.

18 A. I'm trying to remember. It was
19 a -- it was an attorney whose first name
20 is Jeff, and I'm trying to remember what
21 his last name was. But he seemed to be
22 the -- the -- kind of the emcee, if you
23 will. Yeah, Jeff. I'll see if, in the